
EXHIBIT C

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| <p style="text-align: center;">Page 3</p> <p>1 ROUGH DRAFT-UNCERTIFIED COPY 2 THE REPORTER: All parties to this deposition 3 are appearing remotely and have agreed to the 4 witness being sworn in remotely. 5 Due to the nature of remote reporting, 6 please pause briefly before speaking to ensure all 7 parties are heard completely. 8 Counsel will be noted on the 9 stenographic record. 10 Counsel, do you so stipulate to the 11 remote swearing in of the witness? 12 MS. SIEBERT: Plaintiffs' counsel does. 13 MS. RICCHIUTO: IU does. 14 (WHEREUPON, the witness was duly 15 sworn.) 16 BY MS. RICCHIUTO: 17 Q. Hi, Margaret. My name is Anne 18 Ricchiuto. I'm a lawyer for IU and I'm defending 19 them in this lawsuit that you are one of the 20 Plaintiffs in. 21 The other note I want to make about 22 technical issues, I know you've already had one and 23 we all have them all the time. If anything else 24 happens, we will just kind of notify each other and 25 stay in touch and get connected back together as</p> | <p style="text-align: center;">Page 4</p> <p>1 ROUGH DRAFT-UNCERTIFIED COPY 2 quickly as we can. Does that work for you? 3 A. Yep. 4 Q. Okay. Is there anybody in the room with 5 you on your end? 6 A. Yes. My stepmother. 7 Q. Okay. Hello. 8 And that's just fine. We were -- we 9 were aware that that was a possibility. 10 The one thing I just want to say, 11 Margaret, is if there is a time that you want to 12 talk to her for some reason or talk to your lawyer, 13 I need you to tell me that. 14 And can you make a commitment that 15 you're not going to text or use any chat feature or 16 otherwise communicate with her while you're 17 testifying? 18 A. Yes. 19 Q. Okay. Have you ever had your deposition 20 taken before? 21 A. I have not. 22 Q. Okay. So, I'll briefly go over the 23 process. This is just some time for me to ask you 24 some questions and just learn a little bit more 25 about your position in this case.</p> |

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| <p style="text-align: right;">Page 5</p> <p>1 ROUGH DRAFT-UNCERTIFIED COPY 2 You understand you're under oath to 3 testify truthfully today, correct? 4 A. Yes. 5 Q. And I will pose questions to you and 6 I'll be interested in whatever your answers are to 7 those. There aren't right or wrong answers. I'm 8 just trying to understand what your view is. 9 Do you have any notes or documents there 10 with you? 11 A. Nope. 12 Q. Okay. If you -- if I ask you a question 13 and you don't understand it, which happens from 14 time to time, I want you to tell me or ask me to 15 rephrase it. If you answer a question that I ask 16 you, I'm going to assume that you understood it. 17 So, if you don't understand it, please let me know. 18 The Court Reporter is taking down what 19 we say. You can't see her hands, but they are 20 moving really quickly and so we need to help her 21 out by making sure that our answers are audible. 22 So, nods and head shakes and uh-huh and uh-uh, 23 things that we would do in normal conversation, we 24 have to try to make sure not to do because that 25 makes Corey's job harder. So, if I ask you a</p> | <p style="text-align: right;">Page 6</p> <p>1 ROUGH DRAFT-UNCERTIFIED COPY 2 question, I'm going to ask you to answer me 3 audibly. 4 Does that work for you? 5 A. That works. 6 Q. Okay. The last thing I want to let you 7 know is it's possible that your attorney will have 8 an objection to a question that I ask you and 9 that's just fine if she does. 10 For the most part you're going to go 11 ahead and answer the question anyway unless she 12 specifically instructs you not to. So, I just want 13 to let you know that it's possible that she could 14 have an objection and that's perfectly fine. 15 Will you please state your name for the 16 record, Margaret. 17 A. My name is Margaret Roth. 18 Q. Tell me about the lawsuit that we're 19 here to talk about today. 20 A. We are -- well, I'm personally objecting 21 to getting the vaccine. I don't know what to say. 22 Q. Okay. That's okay. That's okay. 23 Is there anything else that you -- that 24 caused you to want to be part of this lawsuit? 25 A. I wanted to be part of this lawsuit to</p> |
| <p style="text-align: right;">Page 7</p> <p>1 ROUGH DRAFT-UNCERTIFIED COPY 2 defend other people's rights to not get the 3 vaccine. 4 Q. Okay. 5 A. I wanted to protect my future health, my 6 future ability to have children. 7 Q. Okay. We'll talk more about those 8 things a little bit later. 9 How did you learn about the opportunity 10 to be part of this lawsuit? 11 A. My father and my stepmother presented it 12 to me and told me that it would be an option to 13 pursue going to IU. 14 Q. Do you know how they found out about it? 15 A. Not specifically, no. 16 Q. Okay. Were they recommending that you 17 become involved as a Plaintiff? 18 A. No. I volunteered. 19 Q. When you said it was an option to attend 20 IU, what do you mean by that? 21 A. I mean that if we can't get this to go 22 through that I will not be attending Indiana 23 University. 24 Q. So, if your injunction is not granted, 25 you will not attend starting in August?</p> | <p style="text-align: right;">Page 8</p> <p>1 ROUGH DRAFT-UNCERTIFIED COPY 2 A. Most likely, yes. 3 Q. So, you might attend? 4 A. Can I speak to my lawyer? 5 Q. Not while a question is pending. I need 6 you to answer the question and then you can talk to 7 her. 8 A. Can you say that again then, please. 9 Q. Sure. I'm just trying to understand if 10 the injunction is not granted whether you will 11 attend IU in August or not. 12 A. If the injunction is not granted, then I 13 will not be attending IU. 14 Q. Have you registered for classes already? 15 A. I have. 16 Q. Do you have living arrangements? What 17 campus are you going to go to Margaret? 18 A. Bloomington. 19 Q. Do you have living arrangements signed 20 up down there? 21 A. I have applied, but they haven't been 22 released. 23 Q. Okay. So, is it your testimony that you 24 will withdraw entirely from IU if the injunction is 25 not granted?</p> |

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| <p style="text-align: center;">Page 25</p> <p>1 ROUGH DRAFT-UNCERTIFIED COPY 2 A. Yeah. 3 Q. To see if you thought you would qualify? 4 A. I didn't personally look into it, but my 5 lawyers and my parents looked into it. 6 Q. And it sounds like your understanding is 7 whatever the criteria are, you don't qualify for 8 that. Is that accurate? 9 A. I believe so, yes. 10 Q. Okay. The next paragraph of your 11 Complaint says, "Additionally, asthma runs in 12 Miss Roth's family, so masks are also not an 13 acceptable alternative." 14 Do you have asthma, Margaret? 15 A. I do not have asthma that has presented. 16 Q. Have you ever been tested for asthma? 17 A. I don't remember. 18 Q. Which family members have asthma? 19 A. My father and my sister. 20 Q. And, so, on the basis of your father and 21 your sister having asthma, is that the basis for 22 your testimony or your allegation in the Complaint 23 that masks are not a -- not something that you can 24 wear or what do you -- what's your limitations with 25 respect to masks?</p> | <p style="text-align: center;">Page 26</p> <p>1 ROUGH DRAFT-UNCERTIFIED COPY 2 A. I mean, yes, there's the asthma portion, 3 but there's also a psychological portion that 4 accompanies it. If I were forced to wear a mask, 5 then I would almost definitely be segregated 6 against, I'd almost definitely be outcast, I would 7 essentially be wearing a scarlet letter as they've 8 been calling it and singling myself out. 9 Q. Okay. So, your concern -- I don't want 10 to -- I want you to tell me. It sounds like you 11 have a concern that if you wore a mask at IU, then 12 you would potentially be treated differently. Is 13 that what you're saying? 14 A. Yes. 15 Q. Where does that understanding come from? 16 A. It comes from personal experience. It 17 comes from seeing posts about other people on 18 social media. It comes from just how I view other 19 people who wear masks or don't. 20 Q. Let's start with that. How do you view 21 people who wear masks or don't? 22 A. I -- I can't really say anything 23 specifically about that because everyone has their 24 own view and their own situation. 25 Q. Okay. Well, you said that a factor for</p> |
| <p style="text-align: center;">Page 27</p> <p>1 ROUGH DRAFT-UNCERTIFIED COPY 2 your concern that you'd be treated differently is 3 how you view people whether or not they wear a 4 mask, and I'm just trying to understand what that 5 means. 6 A. I mean, it's -- my view has changed as 7 the COVID pandemic has changed. I don't know. 8 Q. What did your view used to be about 9 people that wear masks or didn't? 10 A. Well, my view has always been that it's 11 sort of silly, but if I find out that they think 12 it's protecting them, then that's good for them. 13 I don't think anyone should be forced to 14 a mask. There's been multiple studies that show 15 that masks aren't completely preventative. 16 Q. Are there any studies that show that 17 masks provide some preventative benefit? 18 A. I don't remember. 19 Q. Do you remember anything else about the 20 studies that said that they don't provide a benefit 21 or they don't provide I think you said a complete 22 benefit? 23 A. Or benefit at all. I've seen a few 24 studies that have said that, the particles of 25 COVID-19 are too small and get through masks</p> | <p style="text-align: center;">Page 28</p> <p>1 ROUGH DRAFT-UNCERTIFIED COPY 2 anyway. 3 Q. Okay. So, one of the factors that you 4 gave me was how you view people. Another one was 5 posts that you've seen that gave you the impression 6 that you would be treated differently if you wore a 7 mask at IU. Can you say more about what you meant 8 by that? 9 A. Well, just being on social media as 10 teenagers do, I've seen posts where people 11 criticize and berate others for either not wearing 12 masks or if someone is forced to wear a mask 13 because they're not -- they haven't gotten the 14 shot, people will also view them differently and 15 almost attack them. 16 Q. Do people who do get the shot ever get 17 attacked for having gotten the shot? 18 A. I suppose, yes, from others who -- yes. 19 Q. And then another factor that I think you 20 said was your personal experience that these are 21 factors that led to your concern that you might be 22 treated differently at IU. 23 Can you tell me about that personal 24 experience that you were referencing? 25 A. That's just from hearing peers,</p> |

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 2 classmates, co-workers, whoever, talk about others
 3 who are either not wearing masks or wearing masks
 4 and just saying how they would act if they
 5 interacted with that person I suppose.
 6 Q. Did any of this experience happen at IU
 7 Bloomington campus?
 8 A. No.
 9 Q. When you see someone wearing a mask, are
 10 you able to tell if that person has been vaccinated
 11 or not?
 12 A. No.
 13 Q. When the sort of world shut down in
 14 March of 2020 last year, there were a lot of mask
 15 mandates and orders. Some were State, some were
 16 local.
 17 Has there been any times since the
 18 pandemic started in March of 2020 that you have
 19 worn a mask for COVID purposes?
 20 A. Yes.
 21 Q. Can you tell me about those times?
 22 A. I've been forced into wearing a mask
 23 because of the mandates and such, although I didn't
 24 want to.
 25 Q. Can you give me some examples of where

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 2 you've worn a mask?
 3 A. In school, at my work.
 4 Q. Ever go shopping?
 5 A. Yeah.
 6 Q. When you go into a business that
 7 requires masks, do you wear one?
 8 A. If I have to, yes. Otherwise I'll do
 9 online orders or online shopping.
 10 Q. Well, have you ever gone to a store that
 11 had a sign on the front that said masks required
 12 and not worn a mask in that store?
 13 A. I don't remember.
 14 Q. Do you go or did you -- I guess you're a
 15 grad now. Did you go to public school or private
 16 school?
 17 A. Private.
 18 Q. Were you guys on hybrid or full time?
 19 How much time were you wearing a mask for school
 20 during the school year last year?
 21 A. Our schedule changed a lot. We went
 22 from hybrid to all online, back to hybrid, in
 23 person, hybrid. It was all over the place.
 24 Q. Did you have to wear a mask any time you
 25 were at the school building?

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 2 A. Yeah.
 3 Q. About how often was that?
 4 A. I mean --
 5 Q. Understanding that it changed, but let's
 6 say like a hybrid week, how much would you be at
 7 school?
 8 A. It would be 14 to 21 hours about.
 9 Q. In a week?
 10 A. In a hybrid week.
 11 Q. Okay. Where do you work?
 12 A. I work at an ice cream store.
 13 Q. How often do you do that?
 14 A. Three to five times a week.
 15 Q. How long have you had that job?
 16 A. A little over two years.
 17 Q. Did you work three to five times a week
 18 even during the school year?
 19 A. No.
 20 Q. Those are kind of summer hours?
 21 A. Yes.
 22 Q. What about during the school year?
 23 A. During the school year I worked about
 24 once a week.
 25 Q. And are you required to wear a mask

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 2 while you are working at the ice cream store?
 3 A. Yes.
 4 Q. Do you wear a mask while you're working
 5 at the ice cream store?
 6 A. Most of the time.
 7 Q. Have you ever considered quitting that
 8 job so you didn't have to wear a mask?
 9 A. Yes.
 10 Q. But you're still employed there?
 11 A. Yes.
 12 Q. Okay. So, school, work, shopping.
 13 Anywhere else that you can think of that you've
 14 worn a mask in the last year?
 15 A. Not really, no.
 16 Q. Have you been harmed by that mask
 17 wearing?
 18 A. What do you mean by that?
 19 Q. Have you experienced any physical harm
 20 as a result of wearing a mask at school, work and
 21 shopping?
 22 A. I guess I could say just general
 23 overheating, a little bit difficulty to breathe.
 24 Q. Do those things happen every time you
 25 wear a mask?

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| <p style="text-align: center;">Page 33</p> <p>1 ROUGH DRAFT-UNCERTIFIED COPY 2 A. Yes. 3 Q. Have you tried different kinds of masks 4 to see if anything worked better for you? 5 A. What kinds of different masks do you 6 mean? 7 Q. Well, I don't know. If there were 8 something that had a different material that didn't 9 make you as hot or other things to accommodate 10 these experiences that you've had. 11 A. Then, yeah, I've tried different 12 materials. 13 Q. Other than what you told me earlier 14 about your concern that you might be treated 15 differently at Bloomington if you wear a mask, are 16 there other ways that you believe that you will be 17 harmed by wearing a mask at Bloomington? 18 A. I don't know specifically. 19 Q. Another part of your Complaint, and this 20 is in paragraph 211, and again if it doesn't ring a 21 bell, it's totally fine for you to look at it. It 22 says, "Nor is repeated exposure to the carcinogenic 23 chemicals on the nasal testing swabs, especially 24 with her family history of cancer." 25 And I want to ask you about the nasal </p> | <p style="text-align: center;">Page 34</p> <p>1 ROUGH DRAFT-UNCERTIFIED COPY 2 testing swabs. So, what's your understanding of 3 what carcinogenic chemicals are on nasal testing 4 swabs? 5 A. I don't know specifically, but I know 6 that it's substances that are potentially 7 carcinogenic, and I don't want that introduced into 8 my body. 9 Q. And how do you know? You said you know 10 that. How do you know? 11 A. Know what exactly? 12 Q. That there is something potentially 13 carcinogenic on the swabs. 14 A. From -- I guess I don't know 15 specifically. 16 Q. Do you remember when you heard that or 17 where you heard that? 18 A. No. 19 Q. Has a physician ever told you that the 20 testing swabs are potentially carcinogenic? 21 A. Not personally. 22 Q. What do you mean by that? 23 A. I have never had a doctor tell me face 24 to face. 25 Q. Have you had a doctor tell you some </p> |
| <p style="text-align: center;">Page 35</p> <p>1 ROUGH DRAFT-UNCERTIFIED COPY 2 other way? 3 A. No. 4 Q. Has anyone ever told you that being 5 tested for COVID will increase your risk for 6 cancer? 7 A. I've been told that there is a potential 8 risk. 9 Q. And who told you that? 10 A. My parents. 11 Q. Do you know where they got -- how they 12 learned that information? 13 MS. SIEBERT: Objection; hearsay. You can go 14 ahead and answer, though, Margaret. 15 BY THE WITNESS: 16 A. From their own research and -- yeah, 17 from their own research. 18 Q. Have your parents ever been tested for 19 COVID? 20 A. I don't know. 21 Q. Have you ever been tested for COVID? 22 A. No. 23 Q. If you were to be tested for COVID in 24 some way other than with a nasal swab, would you 25 have the same concern about being tested for COVID? </p> | <p style="text-align: center;">Page 36</p> <p>1 ROUGH DRAFT-UNCERTIFIED COPY 2 A. I don't know. 3 Q. Let's do some hypotheticals. What if 4 you could be tested for COVID using a blood test? 5 A. I don't know, but that just seems 6 excessive. 7 Q. What if you could be tested for COVID by 8 some kind of -- seeing something that's on the palm 9 of your hand? 10 A. I don't know. 11 Q. Well, does that seem harmful to you? 12 Would you have the same concerns about harm? 13 A. It just depends on what it is. 14 Q. What about if you could be tested for 15 COVID using your saliva? 16 A. I don't know. 17 Q. Well, it sounds to me like your concern 18 about the swab is the swab's contact with your 19 body. Is that part of what you're concerned about 20 with the swab? 21 A. Yes. 22 Q. So, if you could be tested for COVID in 23 a way where no testing implement had contact with 24 your body, would you feel that that was a less 25 risky way to be tested? </p> |

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 2 the mandate. And first I want to ask you what do
 3 you mean by the mandate there?

4 A. By the mandate, is that what you said?
 5 Q. Yeah, let me read it to you just so you
 6 can have it. This is the sentence. This is in
 7 paragraph 213 of the Complaint.

8 "Miss Roth also has a sincerely held
 9 religious objection to IU's mandate."

10 A. And I --

11 A. I believe that's in reference to the
 12 vaccination mandate. Sorry for interrupting.

13 Q. No. I am here to hear from you. So,
 14 thank you for that answer.

15 So, you have a sincerely held religious
 16 objection to receiving the COVID vaccine or being
 17 required to receive the COVID vaccine or is it
 18 something else?

19 A. Can you repeat that?

20 Q. I just want to understand what is your
 21 objection specifically to?

22 A. It's an objection to being mandated to
 23 receive something that possibly contains aborted
 24 fetal cells.

25 Q. Okay. Where does the understanding come

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 2 from that -- do I take it that you believe that the
 3 vaccine may have some kind of aborted fetal cells
 4 or you tell me what's your understanding about
 5 that?

6 A. From what I understand, it's possible
 7 that one is produced using aborted fetal cells and
 8 it's possible that one has aborted fetal cells
 9 directly in it.

10 Q. Do you know which ones those are?

11 A. No.

12 Q. Have you ever tried to find out?

13 A. No.

14 Q. Are you aware that there's three kind of
 15 generally available vaccines in the U.S.?

16 A. Yeah.

17 Q. So, you described two. Does that mean
 18 that there's a third that you don't have a
 19 religious objection to?

20 A. I don't know.

21 Q. Well, do you have a religious objection
 22 to all three of the COVID vaccines?

23 A. I have a religious objection to the
 24 possibility that there's aborted fetal cells in it
 25 and if it's in one, then it's completely possible

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 2 that it's in another no matter if it's hidden or
 3 not. And I don't want that in my body.

4 Q. If you were to learn that there was no
 5 fetal cells involved in the production of the
 6 vaccine or actually in the vaccine, would you still
 7 have a religious objection to it?

8 A. I don't know.

9 Q. Was there any other basis for your
 10 religious objection other than these potential
 11 cells?

12 A. I don't know.

13 Q. Based on the objection that we just
 14 talked about, did you file for religious exemption
 15 from being vaccinated to attend IU Bloomington?

16 A. No.

17 Q. Why not?

18 A. Because if we filed for the religious
 19 exemption then I would still have to wear a mask
 20 and submit to testing.

21 Q. If you filed for the religious exemption
 22 and it were granted, are you aware that you would
 23 not have to get the vaccine?

24 A. Yes.

25 Q. Do you have plans to seek an exemption

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 2 so that you don't have to get the vaccine?

3 A. I don't know.

4 Q. Well, it sounds like you qualify for
 5 one. Do you agree with that?

6 A. Yes.

7 Q. But you haven't filed for one, correct?

8 A. That's correct.

9 Q. But you could, correct?

10 A. Yes.

11 Q. Your objections to masking and testing,
 12 are those religious objections or are those
 13 objections based on something else?

14 A. Can you say that again?

15 Q. Sure. I think we've established that
 16 you have a sincerely held religious objection to
 17 receiving the COVID vaccine. Do you agree with
 18 that?

19 A. Yes.

20 Q. Or at least the COVID vaccines that do
 21 or may contain cells or tissue that are of concern
 22 to you, correct?

23 A. Correct.

24 Q. And you've also told me some reasons why
 25 you have concerns about mask, wearing a mask and